

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

POLICE AND FIRE RETIREMENT  
SYSTEM OF THE CITY OF DETROIT,  
PLYMOUTH COUNTY RETIREMENT  
SYSTEM, STATE-BOSTON  
RETIREMENT SYSTEM, and MICHAEL  
GOLDE, On Behalf of Themselves and All  
Others Similarly Situated,

Plaintiffs,

v.

SAFENET, INC., ANTHONY A. CAPUTO,  
KENNETH A. MUELLER, CAROLE D.  
ARGO, THOMAS A. BROOKS, IRA A.  
HUNT, Jr., BRUCE R. THAW, ARTHUR  
L. MONEY, SHELLEY A. HARRISON  
and ANDREW E. CLARK,

Defendants.

Lead Case No. 06-cv-5797 (PAC)

**NOTICE OF (A) LEAD PLAINTIFFS' MOTION FOR FINAL APPROVAL OF  
PROPOSED CLASS ACTION SETTLEMENT AND PLAN OF ALLOCATION AND (B)  
LEAD COUNSEL'S MOTION FOR AN AWARD OF ATTORNEYS' FEES AND  
REIMBURSEMENT OF LITIGATION EXPENSES**

**PLEASE TAKE NOTICE** that upon the (i) Joint Declaration of Jonathan Gardner and William C. Fredericks in Support of (A) Lead Plaintiffs' Motion for Final Approval of Proposed Class Action Settlement and (B) Lead Counsel's Motion for an Award of Attorneys' Fees and Reimbursement of Litigation Expenses and the exhibits thereto; (ii) Memorandum of Law in Support of Lead Plaintiffs' Motion for Final Approval of Proposed Class Action Settlement and Plan of Allocation; and (iii) Memorandum of Law in Support of (A) Lead Counsel's Motion for an Award of Attorneys' Fees and Reimbursement of Litigation Expenses and (B) the Class

Representatives' Request for an Award of Expenses under 15 U.S.C. § 78u-4(a)(4), being filed concurrently herewith; and all prior proceedings had herein:

(a) The Court-appointed Class Representatives – the Police and Fire Retirement System of the City of Detroit and the Plymouth County Retirement System – and the Court-appointed Subclass Representative Michael Golde (collectively “Lead Plaintiffs”), through their undersigned counsel, will move this Court before the Honorable Paul A. Crotty on December 20, 2010 at 3:30 p.m. at the United States District Court for the Southern District of New York, Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, NY 10007, for entry of a Final Order and Judgment granting final approval to the proposed Settlement and approving the proposed Plan of Allocation of the Settlement proceeds; and

(b) Lead Counsel, Bernstein Litowitz Berger & Grossmann LLP and Labaton Sucharow LLP, will move this Court before the Honorable Paul A. Crotty on December 20, 2010 at 3:30 p.m. at the United States District Court for the Southern District of New York, Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, NY 10007, for entry of an Order awarding attorneys' fees and reimbursement of litigation expenses and granting the Class Representatives' request for an award of expenses under 15 U.S.C. § 78u-4(a)(4).

Dated: New York, New York  
November 22, 2010

**BERNSTEIN LITOWITZ BERGER  
& GROSSMANN LLP**

/s/ William C. Fredericks  
William C. Fredericks  
Jeremy P. Robinson  
1285 Avenue of the Americas  
New York, New York 10019  
Telephone: (212) 544-1400  
Facsimile: (212) 554-1444

**LABATON SUCHAROW LLP**

Lawrence Sucharow  
Jonathan Gardner  
140 Broadway  
New York, New York 10005  
Telephone: (212) 907-0700  
Facsimile: (212) 818-0477

*Lead Counsel for Lead Plaintiffs and the  
Settlement Class and Subclass*

To: **SULLIVAN & CROMWELL LLP**

Richard H. Klapper  
Andrew H. Reynard  
125 Broad Street  
New York, NY 10004

*Attorneys for Defendant SafeNet, Inc.*

**ARNOLD & PORTER, LLP**

John A. Freedman  
Joshua P. Wilson  
555 Twelfth St., N.W.  
Washington, DC 20004-1206

*Attorneys for Defendant Anthony A. Caputo*

**WILMER CUTLER PICKERING  
HALE AND DORR LLP**

Paul A. Engelmayer  
Matthew B. Holmwood  
399 Park Avenue  
New York, NY 10022

*Attorneys for Defendant Carole D.  
Argo*

**DLA PIPER LLP (US)**

Jonathan D. King  
Samuel Isaacson  
203 N. LaSalle St., Suite 1900  
Chicago, Illinois 60601-1293

*Attorneys for Kenneth A. Mueller*

#494910.1